

Laurie Shertz LLC, OSB 96477  
e: [Laurie@LShertzlaw.com](mailto:Laurie@LShertzlaw.com)  
121 SW Salmon, 11<sup>th</sup> Floor  
Portland, OR 97204  
tel: 503/471-1332  
fax: 503/296-5669  
Attorney for Douglas Ferguson

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. CR 01-321 KI

Plaintiff,

vs.

Motion for Issuance of Letter Rogatory  
to Grenada for the Deposition of Pauline  
Radix

VAN BRINK ET. AL,

**Hearing Requested**

Defendants.

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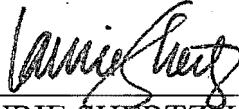
The defendant Douglas Ferguson, through his attorneys Thomas Coan and Laurie Shertz, along with the attorneys for codefendants Rita Regale, Robert Skirving, and Laurent Barnabe, move this Court for the issuance of Letter Rogatory to Grenada for a Rule 15 perpetuation deposition of Pauline Radix. This motion is based on the attached memorandum, the memorandums submitted in support of the Motion for Order

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Allowing Depositions Pursuant to Rule 15, the Motion to Compel Government to Utilize MLAT, and supported by the information contained in the individual Proposed Letter Rogatory for this witness.

Respectfully Submitted this 19<sup>th</sup> day of May, 2006.



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LAURIE SHERTZ, LLC, OSB #96477  
Attorney for Douglas Ferguson

**CERTIFICATE OF SERVICE**

I hereby certify that on 19 May 2006, I served a copy of the foregoing:

*Motion to Issue Letter Rogatory for Deposition of Pauline Radix*

on counsel for each defendant and the government by mailing to said attorney a copy by First Class Mail, postage paid, deposited in the United States Mail at Portland, Oregon, addressed to said attorney at his/her last known address listed below, or by personally delivering to said attorney:

**Attorneys for the Government:**

Claire Fay  
Assistant United States Attorney  
1000 SW Third Avenue, Suite 600  
Portland, OR 97204

Kent Robinson  
Assistant United States Attorney  
1000 SW Third Avenue, Suite 600  
Portland, OR 97204

**Attorneys for Laurent Barnabe:**

Lynne B. Morgan  
Attorney at Law  
1 SW Columbia Street, Suite 1110  
Portland, OR 97258

Douglas Stringer  
Attorney at Law  
1211 SW 5th Ave Ste 2950  
Portland OR 97204

**Attorneys for Rita Regale:**

Philip A. Lewis  
Attorney at Law  
111 SW Fifth Avenue, Suite 1650  
Portland, OR 97204

Gail Meyer  
Attorney at Law  
3933 NE 32nd Place  
Portland, OR 97212

**Attorneys for Robert Skirving:**

Kristen Winemiller  
Attorney at Law  
1420 World Trade Center  
121 SW Salmon Street  
Portland, OR 97204

Jacob Wieselmann  
Attorney at Law  
1420 World Trade Center  
121 SW Salmon Street  
Portland, OR 97204

**Attorneys for Douglas Ferguson:**

Thomas Coan  
Attorney at Law  
621 SW Morrison St., Suite 1150  
Portland, OR 97205

Laurie Shertz  
Attorney at Law  
121 SW Salmon, 11<sup>th</sup> Floor  
Portland, OR 97204



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LAURIE SHERTZ, LLC, OSB #96477  
Attorney for Douglas Ferguson